

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:17-CR-169-B

SAID AZZAM MOHAMAD RAHIM

UNOPPOSED MOTION TO CONTINUE TRIAL

The United States of America files this unopposed motion seeking an order continuing the trial and related dates set in this case and for a finding of excludable time under the Speedy Trial Act as found in 18 U.S.C. § 3161, *et seq.*, and would show the Court as follows:

1. This case is currently set for trial on May 7, 2018.
2. The Court previously designated this case as complex under the provisions of 18 U.S.C. § 3161(h)(7)(A) and (B)(ii).
3. On February 14, 2018, the United States Grand Jury returned a Superseding Indictment charging Said Azzad Mohamad Rahim with 18 U.S.C. § 2339B (Material Support to Terrorism) in addition to the charges in the original Indictment. Additionally, the government anticipates that a significant amount of discovery that is the subject of a CIPA 4 filing will be provided to the defendant in the future. Based on the anticipated volume of that discovery, counsel for the defendant will need additional time to review the discovery.

4. The government represents to the Court that Defendant Rahim is unopposed to the filing of this motion.

5. This continuance is not being sought for delay, rather, it is sought because the ends of justice reached by continuing the trial date outweigh the best interest of the public and the defendants in a speedy trial.

6. The government asks the Court to grant this motion to continue for a reasonable period of time to allow the parties to complete discovery and prepare for trial.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Errin Martin
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Certificate of Conference

On April 5, 2018, the government conferred with James Whalen, counsel for Defendant Said Azzam Mohamad Rahim, and he was unopposed to the filing of this motion.

s/ Errin Martin

Errin Martin

Assistant United States Attorney

Certificate of Service

I certify that on April 6, 2018, a copy of this motion was served through CM/ECF on Said Azzam Mohamad Rahim's attorney of record, James Whalen.

s/ Errin Martin

Errin Martin

Assistant United States Attorney